Commonwealth of Kentucky Before the Public Service Commission

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PUBLIC SERVICE COMMISSION

In the Matter of:

Charles E. Hardin, Jr., Individually and)
Charles E. Hardin, Jr., Magoffin County)
Judge Executive O/B/O the Magoffin	Case No. 2014-00038
County Fiscal Court and Consumers)
of Magoffin County Receiving Natural)
Gas Services from Kentucky Frontier)
Gas LLC	<u> </u>

DATA REQUESTS OF KENTUCKY FRONTIER GAS, LLC

Kentucky Frontier Gas, LLC, (Frontier) by counsel submits its data requests to the

Complainants Charles E. Hardin, Jr., individually and as Magoffin County Judge Executive.

- 1. Provide the minutes of all Magoffin County Fiscal Court meetings that discuss natural gas service in Magoffin County provided by Kentucky Frontier Gas Company LLC (KFG) since 2012.
- 2. Provide all Fiscal Court resolutions that relate to the natural gas service of Kentucky Frontier Gas since 2012.
- 3. Provide the minutes of the Fiscal Court meeting showing the vote by Fiscal Court members supporting the filing of the complaint against Kentucky Frontier Gas, which is the subject of this action.
- 4. Provide the public notice of the Fiscal Court meeting for the date of the minutes provide in request number 3 above.
- 5. Provide all emails, correspondence or other communications among the Fiscal Court members or the County Judge Executive with the local Magoffin County newspaper, the local radio station, the Kentucky PSC, and other state or local government officials for the period July 1, 2013 to April 30, 2014, related to the natural gas service provided by Kentucky Frontier Gas. Communication as used throughout this data request means any transmission or exchange of information between two or more persons, whether orally or in writing, and includes, without limitation, any conversation or discussion by means of letter, telephone, social media, note, memorandum, telegraph, telex, telecopy, cable, email, or any other electronic or other medium.

- 6. Provide all emails, correspondence or other communications among Charles Hardin, Jr, individually with the local Magoffin County newspaper, the local radio station, the Kentucky PSC, and other state or local government officials related to natural gas service by Kentucky Frontier Gas.
- 7. Provide all natural gas bills from Kentucky Frontier Gas for Charles Hardin, Jr.'s personal residence or other location of receipt of natural gas service from Kentucky Frontier Gas.
- 8. Provide the Magoffin County Fiscal Court minutes authorizing the Magoffin County Attorney to represent Charles Hardin, Jr, individually in this action.
- 9. Provide all correspondence from Charles Hardin, Jr., County Judge Executive, Charles Hardin, Jr., individually, and any member of the Magoffin County Fiscal Court with Kentucky Frontier Gas related to natural gas service cut off to the Magoffin County Justice Center in January, 2014.
- 10. Provide all correspondence including social media correspondence, links, messages, or other related communications that were posted on any Magoffin County government communication device that discuss, refer to or otherwise mention damage to the Magoffin County Justice Center and the damage caused by Kentucky Frontier Gas as alleged in the Complaint.
- 11. Provide a detailed description of all damage to the Magoffin County Justice Center alleged to have been caused by the actions of Kentucky Frontier Gas as stated in the Complaint, including but not limited to cost estimates for repairs, diagrams, blueprints, inspection reports or any other similar documents.
- 12. Provide all minutes of any Fiscal Court meeting that include discussions of the damages to the Justice Center caused by Kentucky Frontier Gas as alleged in the Complaint.
- 13. Provide all requests for bids, invoices, bills, work orders and any other documents related to the repairs to the Justice Center related to damages alleged in the Complaint.
- 14. Provide the names, job titles and business addresses of all county employees involved in the repairs of damage to the Justice Center related to the damages alleged in the Complaint.
- 15. Provide all Fiscal Court approvals of payments of any invoices, bills or other obligations related to repairs of damages to the Justice Center as alleged in the Complaint.
- 16. Provide any pictures, photographs, videos or other documentation of the damages to the Justice Center caused by Kentucky Frontier Gas as alleged on the Complaint.
- 17. Provide a description of all actions by the County Judge Executive to mitigate any possible damages to the Magoffin County Justice Center after he learned of the natural gas shutoff by Kentucky Frontier Gas in January, 2014.

Submitted by:

John N. Hughes 124 W. Todd St. Frankfort, KY 40601 PH 502 227 7270 inhughes@fewpb.net

Attorney for Kentucky Frontier Gas Company, LLC

Certificate of Service:

I certify that a copy of this data request was served on Gregory Allen, Box 585, Salyersville, KY 41465, by first class mail the 30th day of June, 2014.

ohn N. Hughes